

EXHIBIT A

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

| | | |
|-------------------------------------|---|--|
| INGRAM BARGE COMPANY LLC, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. 3:21-cv-00674 |
| |) | Judge William L. Campbell, Jr. |
| MICHIGAN SALT PRODUCTS, LLC, |) | Magistrate Judge Alistair Newbern |
| |) | |
| Defendant. |) | |

DECLARATION OF W. BRANTLEY PHILLIPS, JR.

I, W. Brantley Phillips, Jr., hereby declare as follows.

1. I am a citizen and resident of the State of Tennessee. I am over 18 years of age, and I am otherwise competent to give testimony.

2. I am a partner with the law firm of Bass, Berry & Sims PLC, and I am a member in good standing of the bar of this Court. I am one of the attorneys representing Plaintiff Ingram Barge Company LLC (“IBCO”) in the above-styled action.

3. At my direction and under my supervision, IBCO filed its Complaint in this matter on August 30, 2021. The Clerk of Court issued a summons to Michigan Salt Products LLC (“Michigan Salt”) on August 31, 2021. At my direction and under my supervision, a copy of IBCO’s Complaint in this matter was promptly served on Michigan Salt via certified mail on September 7, 2021, which, in turn, required Michigan Salt to file a responsive pleading no later than September 28, 2021, absent an agreed extension of that deadline or other relief from this Court.

4. Despite that effective service of process and responsive pleading deadline, as of the date of this declaration, Michigan Salt has yet to respond to IBCO's Complaint or otherwise enter a notice of appearance in this matter.

5. Upon information and belief, Michigan Salt is a Michigan limited liability company with its principal place of business at 1120 South Lapeer Road, Suite 200, Oxford, Michigan 48371. Upon information and belief, Michigan Salt is not an individual, nor an infant, nor is it incompetent.

6. Pursuant to Rule 55.01 of the Local Rules of Court, I declare the foregoing under penalty of perjury per 28 U.S.C. § 1746.

DATED this 7th day of December, 2021.

/s/ W. Brantley Phillips, Jr.
W. Brantley Phillips, Jr.